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A LIMITED LIABILITY LAW PARTNERSHIP LLP

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Attorney for Defendant  
SULLIVAN PROPERTIES, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

SCOTTSDALE INSURANCE  
COMPANY,

Plaintiff,

vs.

SULLIVAN PROPERTIES, INC.;  
ROBERT B. SULLIVAN; MAUI  
LAND & PINEAPPLE COMPANY,  
INC.; AND KAPALUA LAND  
COMPANY, LTD.,

Defendants.

CIVIL NO. CV04-00550 HG BMK  
(Declaratory Relief)

DEFENDANT SULLIVAN  
PROPERTIES, INC.'S **JOINDER**  
**IN DEFENDANT ROBERT B.**  
**SULLIVAN'S MEMORANDUM**  
**IN OPPOSITION TO PLAINTIFF**  
**SCOTTSDALE INSURANCE**  
**COMPANY'S MOTION FOR**  
**PARTIAL SUMMARY**

**JUDGMENT RE:**  
**REIMBURSEMENT OF CLAIM,**  
FILED DECEMBER 1, 2006 (filed  
01/04/07); CERTIFICATE OF  
SERVICE

*Hearing: January 22, 2007*

*Time: 9:30 a.m.*

*Judge: Hon. Helen Gillmor*

DEFENDANT SULLIVAN PROPERTIES, INC.'S  
JOINDER IN DEFENDANT ROBERT B. SULLIVAN'S  
MEMORANDUM IN OPPOSITION TO PLAINTIFF  
SCOTTSDALE INSURANCE COMPANY'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT RE: REIMBURSEMENT  
OF CLAIM, FILED DECEMBER 1, 2006 (filed 01/04/07)

Defendant SULLIVAN PROPERTIES, INC. ("SPI"), by and through  
its attorneys, Goodsill Anderson Quinn & Stifel, A Limited Liability Law  
Partnership LLP, pursuant to LR 7.2, 7.4, 7.9 and 56.1 of the Local Rules of  
Practice for the United States District Court for the District of Hawaii, hereby joins  
in Defendant Robert B. Sullivan's Memorandum in Opposition to Plaintiff  
Scottsdale Insurance Company's Motion for Partial Summary Judgment Re:  
Reimbursement Claim, filed December 1, 2006, filed herein on January 4, 2007.

DATED: Honolulu, Hawaii, January 5, 2007.

/s/ Roy J. Tjioe

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Attorney for Defendant

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Defendants.

CIVIL NO. CV04-00550 HG BMK  
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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing  
document was duly served upon the following parties, in the manner described  
thereto, at their last-known addresses on the date indicated below:

	<u>HAND DELIVERED</u>	<u>MAILED</u>	<u>FAXED</u>	<u>ECF</u>
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JEFFREY H. K. SIA jeffrey.sia@hawadvocate.com Pauahi Tower, Suite 2500 1001 Bishop Street Honolulu, HI 96813	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ALAN B. YUTER RACHEL E. HOBBS THOMAS A. BURGOS, III Selman Breitman LLP 11766 Wilshire Boulevard, 6 <sup>th</sup> Floor Los Angeles, CA 90025-6538	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Attorneys for Plaintiff</i> <b>SCOTTSDALE INSURANCE COMPANY</b>				
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<i>Attorney for Defendant</i> <b>ROBERT B. SULLIVAN</b>				

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***Attorney for Defendants  
MAUI LAND & PINEAPPLE  
COMPANY, INC. and KAPALUA  
LAND COMPANY, LTD.***

DATED: Honolulu, Hawaii, January 5, 2007.

/s/ Roy J. Tjioe

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ROY J. TJIOE

Attorney for Defendant

SULLIVAN PROPERTIES, INC.